

**AFFIDAVIT IN SUPPORT OF SEARCH WARRANT**

I, Brad Kiernan, Special Agent of the Federal Bureau of Investigation (“FBI”), being duly sworn, depose and state as follows:

**INTRODUCTION**

The facts of this case, as more fully detailed herein, are that on or around February 3, 2022, within the District of Arizona, GLEN Adam Romero and ANA Lizeth Romero committed violations Title 21 United States Code §§ 922(g)(1) Possession of a Firearm by a Convicted Felon, and 924(c), Possession of a Firearm During and In Furtherance of a Drug Trafficking Offense. I am requesting that the Court issue a search warrant to search for evidence of the above violations located at 2510 North Winstel Boulevard, Unit #102 in Tucson, Arizona, further described in Attachment A, in support of an investigation into the aforementioned crime.

**PRELIMINARY BACKGROUND INFORMATION**

Your affiant, Brad Kiernan, is a Special Agent of the FBI and is currently assigned to the Tucson office. In the course of his official duties, your affiant is responsible for investigating federal crimes occurring within the District of Arizona, which include violent crimes. Your affiant has training and experience in investigating such crimes.

The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, officers, investigators, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. I have set forth only the facts that I believe are necessary to establish probable cause to believe that evidence of the violations of Title 21 United States Code §§ 922(g)(1) Possession of a Firearm by a Convicted Felon, and 924(c), Possession of a Firearm During and In Furtherance of a Drug Trafficking Offense is located at 2510 North Winstel Boulevard, Unit #102 in Tucson, Arizona, further described in Attachment A. Accordingly, this application requests authority to search 2510 North Winstel Boulevard Unit #102 as

described in Attachment A, for evidence of this crime as described in Attachment B.

This court has jurisdiction over these offenses under Title 21 United States Code §§ 922(g)(1) Possession of a Firearm by a Convicted Felon, and 924(c), Possession of a Firearm During and In Furtherance of a Drug Trafficking Offense because the below-described events occurred within the confines of the District of Arizona, in Pima County, Arizona.

### **BACKGROUND OF INVESTIGATION**

1. In early October 2020, the Federal Bureau of Investigation's ("FBI") Southern Arizona Violent Crime and Gang Task Force ("SAVCTF") began an investigation into the Southside Murda Gang Killas ("SMGK"), to include Bryan MORENO-AGUILAR ("MORENO-AGUILAR"), ALFREDO Mireles ("ALFREDO"), and others both known and unknown. The SAVCTF learned that MORENO-AGUILAR, ALFREDO, and SMGK were involved in the smuggling of Undocumented Non-Citizens ("UDNC") from areas near the international border to Tucson and Phoenix; the smuggling and sale of controlled substances, namely counterfeit M30s, and methamphetamine from Mexico into the United States; and the smuggling of firearms from the United States into Mexico.
2. SMGK has approximately 35 members to include associates. MORENO-AGUILAR is one of the founding members of SMGK. SMGK is a violent Bloods hybrid criminal street gang, which does not have the traditional geographical boundaries to delineate their territory. Members of SMGK can have multiple gang affiliations without the exclusivity of membership in a single traditional criminal street gang. In addition to commonly wearing red, SMGK members use hand signals which include the "b" formed by connecting the index finger to the thumb, leaving the remaining three fingers in an upright position.
3. SMGK members and associates have been involved in two Officer Involved Shootings with the Tucson Police Department. During one of the shootings, juvenile SMGK member E.V. discharged a firearm at officers, striking and injuring a Police

K-9. SMGK members and associates have also been involved in several armed robberies and homicides.

4. Furthermore, through the investigation, the SAVCTF identified that MORENO-AGUILAR is working with ALFREDO, GABRIEL Mireles (“GABRIEL”), JULIAN Mireles (“JULIAN”), Julio Nunez OJEDA (“OJEDA”), Ervyn RIVAS Jaime (“RIVAS”), Briana RINCON (“RINCON”), M.R. [Juvenile], J.A. [Juvenile], GLEN Adam Romero (“GLEN”), ANA Lizeth Romero (“ANA”) and others both known and unknown to traffic firearms and bulk U.S. currency, as well as to smuggle and distribute controlled substances, mainly counterfeit M30 pills, which are commonly known to contain fentanyl.

5. On October 7<sup>th</sup>, 2021, two Federal Court Orders authorizing the Interception of Wire and Electronic Communications (WT-21-07-TUC-RM(A) & WT-21-06-TUC-RM(A)) were issued by United States Judge Marquez, District of Arizona. The Court Orders authorized the interception of communications over a cellular telephone, utilized by MORENO-AGUILAR (hereinafter **TD#1**), as well as a Snapchat Account with username “A293”, utilized by MORENO-AGUILAR (hereinafter **TA#01**), and a Snapchat Account with username “GABRIEL26RAY” (hereinafter **TA#04**), utilized by GABRIEL. On December 8<sup>th</sup>, 2021, those Federal Court Orders (WT-21-07-TUC-RM(B) & WT-21-06-TUC-RM(B)) were renewed, again authorizing the interception of communications over **TD#1** and **TA#01**, **TA#04**, as well as authorizing the initial interception of communications over a cellular telephone utilized by ALFREDO (hereinafter **TD#2**), and a cellular telephone utilized by RINCON (hereinafter **TD#3**).

6. Based on the interception of Wire and Electronic communications, in conjunction with physical surveillance and traffic stops, agents identified that between approximately the middle of October, 2021 and the middle of November, 2021, MORENO-AGUILAR was coordinating the sale of counterfeit M30 pills, with the assistance of ALFREDO at 5810 East 23<sup>rd</sup> Street and juvenile M.R. at 5402 East 30<sup>th</sup> Street in Tucson, Arizona. In early December, 2021, agents identified that

MORENO-AGUILAR had shifted to coordinating the sale of counterfeit M30 pills primarily out of 10245 South Summit Pointe Drive with the assistance of juvenile J.A. On December 23, 2021, J.A. was arrested by the TPD after he was found to be in possession of approximately 16,000 counterfeit M30 pills during a traffic stop.

7. On December 29, 2021, agents intercepted the below conversations between MORENO-AGUILAR, using **TA#01**<sup>1</sup>, and GLEN and ANA, using Snapchat Username “luckyana520”<sup>2</sup>. The following audio messages were intercepted, which were English, and have been transcribed below:

**TA#01:** Hey, What's up..what's up. I just need..alright check it out. I just need someone...a stash house where I can put my shit away. And fucking I already have someone to trap for me. But if it will be easier for you to trap and put it away...shit I could pay you for both. You feel me? I'll pay you for putting the stuff away and I can pay you for trapping. I mean I have all the customers. I just need someone to get fucking active like fucking 100 pack, 10 pack are here. You see what I'm saying?

**TA#01:** That's why I've been closed. Cause I haven't....I haven't had anyone to trap for me.

**Luckyana520:** Yo. Bet fool. I am down to do some shit like that dog. Fucking....I got a couple houses. I could do it in fucking. I'm down to serve shit. Let me know. I got you.

**TA#01:** Shit we can run it fam. Ya, we can run it. Ya we been fucking, I haven't been doing nothing

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<sup>1</sup> Based on the interception of wire and electronic communications, search warrants, subpoenas, physical surveillance, interviews, and undercover activity, agents believe that MORENO-AGUILAR utilizes Snapchat username “a293”, **TA#01**.

<sup>2</sup> Based on the interception of wire and electronic communications, subpoenas, and physical surveillance, agents believe that GLEN and ANA utilize Snapchat username “luckyana520”.

because my homie fam fucking got caught driving around with a strap and shit. They took him to jail and shit. So fucking you feel me. I didnt have many people I could trust and shit, but fuck it. I have a 10 pack right there. This is basically what I can do fam. I could...I could pay you a \$100 for each boat you take care of. You feel me. Just for stashing it. And then well obviously I'll pay you I can pay you \$200 each boat you sell for me too. You feel me? So, lets say lets say you hold a 10 pack that already a rack I would owe you and then 200 for each boat...\$200 for each boat you sell for me. But I have all the customers. All I would need you to do is...Fam they are outside for a 200 pack...fam they are outside for a 300 pack....Fam they are outside for 100. You feel me? And then once we get rid of that boat then you just got 200 for you and then you see what I am saying?

**TA#01:** Ya fam. I need help. I need help. I've been trying fucking been trying to get active and shit.

**Luckyana520:** Bet fool shit. Hell ya. I'm with that. Like I said and I probably still be buying shit off you. So don't even sweat it fool. Like I said I'm still down to work with you homie and I'm down to do this shit. I ain't no fuck nigger, so you ain't got to worry about nothing like that. But for real fool, if you want to do it....lets do it. I got you.

**Luckyana520:** I have an RV fam I can be mobile in different parts of town so it's not the same spot too (*Text Chat*)

**TA#01:** Ya. Ya. Lets get it. Lets get it. I give my word. Lets get it. Get shit popping. Fuck ya. Ya. Lets get it. Lets make it happen. Ya, that's why I haven't even been active or nothing dog. because I haven't had...I don't really trust anybody like that you feel me? But fucking. I'll fuck with you guys. Lets get it. Lets get it. Get shit popping. Fucking, I'm gonna try to getting those 10. I'm

gonna try getting that 10 pack ready. Is there any way you can just slide and pick it up real quick. Or would I have to take it to your spot?

**Luckyana520:** Yeah or whatever's easier for you dog, fucking I got a sport on the North side, I got a spot on the South side fucking which ever way is closer for you, if it's better for me to go pick it up cool, then I am with that, but if you want to drop it off then shit you can drop it off too that way you know where my spot's at

8. Based on your agents training, experience, and knowledge of this investigation, when MORENO-AGUILAR, says "...I just need someone...a stash house where I can put my shit away...", agents believe that MORENO-AGUILAR is saying that he needs someone to store controlled substances for him. Agents know the term "stash house" to be a term commonly used by controlled substance traffickers to refer to a location used to store controlled substances. Furthermore, in the above conversation, agents believe that GLEN and ANA are agreeing to store and distribute controlled substances for MORENO-AGUILAR. When GLEN, using "luckyana520", says "...I got a couple houses..." and "...I got a sport on the North side, I got a spot on the South side...", agents believe GLEN is telling MORENO-AGUILAR that he has multiple locations, on both the north and south sides of Tucson, to store and distribute controlled substances.

9. On December 30, 2021, agents intercepted communications, identifying that GLEN had created a Snapchat account with username "azboygordo1"<sup>3</sup>.

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<sup>3</sup> Based on the interception of wire and electronic communications and physical surveillance, agents believe that GLEN utilizes Snapchat username "azboygordo1". Furthermore, agents spoke with the Pima County Jail who advised that GLEN uses the moniker of "gordo", consistent with the Snapchat username.

**871 WEST ACADIA DRIVE**

10. Agents conducted a query of the Arizona Department of Motor Vehicles for GLEN and ANA, and identified that both GLEN and ANA listed 871 West Acadia Drive as their residence on their Driver's Licenses. Furthermore, agents spoke with the Tucson Electric Power Company and identified that ANA is listed as the subscriber for utilities.

11. On December 11, 2021, agents intercepted a conversation between ANA, using Snapchat username "luckyana520", and MORENO-AGUILAR, using **TA#01**. Below is a portion of the conversation:

<b>Luckyana520:</b>	Ok he needs 2 boats
...	
<b>TA#01:</b>	Want me to take em to u
...	
<b>Luckyana520:</b>	871 w Acadia dr
<b>TA#01:</b>	Want me to take em ?
<b>Luckyana520:</b>	Yes please
...	
<b>Luckyana520:</b>	231 short
<b>Luckyana520:</b>	1769
<b>Luckyana520:</b>	I'm recounting now

12. Based on your agents training, experience, and knowledge of this investigation, when ANA says "Ok he needs 2 boats", agents believe that ANA is telling MORENO-AGUILAR that GLEN needs 2,000 counterfeit M30 pills. ANA subsequently provides her address, "871 w Acadia dr". ANA later confirms that the M30 pills were delivered, and informs MORENO-AGUILAR that only 1,769 pills were delivered and they were "231 short" from the agreed upon 2,000.

13. In the December 29, 2021, conversations referenced above, when GLEN, using "luckyana520", tells MORENO-AGUILAR "... I got a spot on the South side...", agents believe GLEN is telling MORENO-AGUILAR that he will use 871

West Acadia Drive, which is geographically located on the south side of Tucson, to store and distribute controlled substances. Additionally, in the same conversation, GLEN tells MORENO-AGUILAR “I have an RV fam I can be mobile in different parts of town so it’s not the same spot too”, which agents believe is GLEN telling MORENO-AGUILAR that he has a Recreational Vehicle that he (GLEN) is able to use to sell counterfeit M30 pills from different locations around Tucson. Agents conducted physical surveillance at 871 West Acadia Drive and observed a Recreational Vehicle parked at the property, which had Arizona Registration 8XA-4GD, with is registered to GLEN.

14. On January 3, 2021, agents intercepted a conversation between GLEN, using Snapchat username “azboygordo1”, and MORENO-AGUILAR, using **TA#01**. The following is a portion of the conversation:

...  
**TA#01:** Famo, I am going to send them to Panda Express alright, Panda Express right there on Valencia. He’s going to give you a 10 pack, a 10 pack (*Audio Note*)  
**TA#01:** He’s gonna be there like in 40, 30 minutes (*Audio Note*)  
**azboygordo1:** Bet...  
 ...  
**azboygordo1:** Got them On my way! Home to look at them...,  
 ...  
**azboygordo1:** I’m gonna start weighting them now  
 ...

15. Following the above conversation, agent’s then intercepted a video sent from GLEN, using “azboygordo1” to **TA#01**. In the video, agents observed a female’s left hand counting out nine Ziploc bags filled with what agents believe to be approximately 1,000 counterfeit M30 pills on a table. On the female’s hand the word “Queen” can be seen tattooed from behind her left thumb down to the base of her index finger knuckle. During the video, a 10th Ziploc bag filled with what agents believe to be approximately 1000 counterfeit M30 pills is placed on the table by a male’s left hand. The male’s left hand has the word “King” tattooed from behind



his left thumb down to the base of his index finger knuckle. The male then pours the contents of bag number ten into a plastic Dutch Brothers cup which is placed on a scale and a female's voice states the weight which can also be seen on the scale as 111 grams. Agents reviewed body camera footage from the Tucson Police Department as well as booking photographs from the Pima County Jail, and confirmed that ANA has the word "Queen" tattooed on her left hand and GLEN has the word "KING" tattooed on his hand, matching the tattoos observed in the video. After comparing the video with the known photographs of GLEN and ANA, agents confirmed that the hands observed in the video were in fact those of GLEN and ANA.

16. Furthermore, agents reviewed video footage from a Pole Camera that was installed near 871 West Acadia Drive, and confirmed that a Dodge Durango with Arizona Registration V9A24E, registered to GLEN, departed 871 West Acadia Drive at approximately 6:15 PM and returned to 871 West Acadia Drive at approximately 6:46 PM. Agents reviewed surveillance footage from a Panda Express located at 1606 West Valencia Road, and observed a vehicle matching the description of the Durango to arrive and park in the lot. The vehicle had brief contact with two individuals and then departed, which was during the same time frame as the intercepted communications and Pole Camera observations. Based on the above information, agents believe that the intercepted video, sent by GLEN, using "azboygordo1", was recorded at 871 West Acadia Drive, and the counterfeit M30 pills were subsequently weighed and stored at 871 West Acadia Drive.

17. Agents continued to intercept communications between GLEN, ANA, and MORENO-AGUILAR, discussing how GLEN and ANA were distributing counterfeit M30 pills on behalf of MORENO-AGUILAR. For example, agents intercepted the following conversation between ANA, using "luckyana520", and MORENO-AGUILAR, using TA#01:

<b>Luckyana520:</b>	He wants to trap today lmk
<b>TA#01:</b>	Bet bet let's get it

**TA#01:** Fmao  
**TA#01:** 2 boats on the way he gots 3k\$ take out 100 blues  
 out the pack w  
**TA#01:** What's the addy to where I sent him  
**Luckyana520:** 871 w Acadia dr

18. Additionally, on January 4, 2022, agents intercepted communications between Snapchat username “igotdajuce559”, a username believed to be utilized by Jamal RAGSDALE, and MORENO-AGUILAR, using **TA#01**. In the conversations, MORENO-AGUILAR sends RAGSDALE to 871 West Acadia Drive to purchase 100 counterfeit M30 pills. Agents reviewed Pole Camera footage from 871 West Acadia Drive and observed a vehicle matching the description of a vehicle known to be used by RAGSDALE, a grey colored Nissan Altima, arrive at the residence and have a brief interaction with GLEN before departing. The vehicle then returned to 871 West Acadia Drive a short time later and had a brief interaction with an individual before departing. RAGSDALE was later arrested by the Cochise County Sheriff's Department, after they conducted a traffic stop on the Nissan Altima and approximately 100 fentanyl M30 pills<sup>4</sup> were located inside of his vehicle.

19. Furthermore, both physical surveillance and observations from a Pole Camera installed near 871 West Acadia Drive identified that both GLEN and ANA frequently drive several different vehicles, to include a Dodge Durango with Arizona Registration V9A24E, and a Chevrolet Equinox with Arizona Registration KAA7BB, including driving these vehicles to 2510 North Winstel Boulevard and 30 West 25<sup>th</sup> Street, which are additional locations that GLEN and ANA are known to utilize to distribute counterfeit M30 pills. Both the Durango and the Equinox are registered to the GLEN at the 871 West Acadia Drive address.

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<sup>4</sup> Agents received laboratory results from the Arizona Department of Public Safety Crime Laboratory which indicated that a Field Test was conducted on a sample of the M30 pills which identified a usable quantity of Fentanyl.

**30 WEST 25<sup>th</sup> STREET**

20. Agents queried the Pima County Assessor's Office and identified that 30 West 25<sup>th</sup> Street is located on the same parcel as 32 West 25<sup>th</sup> Street and both structures and the parcel are owned by "Virginia Langford". Furthermore, according to the Pima County Assessor's Office there are two livable areas located within the parcel, and there is a note from 2013 which states "Owner Confirmed Rental Use". Agents utilized physical surveillance and queried aerial maps utilizing www.bing.com and observed that there are numerous sheds and structures throughout the entire parcel with no obvious delineation between structures, appearing to be a commonly shared and utilized parcel. Furthermore, agents observed that the 30 West 25<sup>th</sup> Street is the address that is visible from the street when travelling down West 25<sup>th</sup> Street, and it would be reasonable to believe that if someone were to provide the address to the parcel, 30 West 25<sup>th</sup> Street would be the most easily located address for someone not familiar with the area, such as a customer merely travelling to the location to purchase controlled substances. Furthermore, while conducting physical surveillance, agents were not able to ascertain exactly which structures on the property were being frequented by GLEN in conjunction with the controlled substance trafficking.

21. On December 30, 2021, agents intercepted conversations between GLEN, using "azboygordo1", and MORENO-AGUILAR, using **TA#01**. A portion of the conversations are below:

<b>TA#01:</b>	Wassup Famo goodmoring 🤔
<b>Azboygordo1:</b>	What s good dawg morning...let's get get this...
<b>TA#01:</b>	Gang do me a parro can you sent new addy ram
<b>TA#01:</b>	Fam
<b>Azboygordo1:</b>	30w 25th st
<b>TA#01:</b>	Everyone saying the nasty huh fam I'm try getting em out today so we can re off my other plug better quality Nd better Pr the only thing is

that I can to get 25k Nd up for that Pr but fuck it let's get it but if u want u can pitch in Nd get em for a 1\$ too either way I'm get u 5 for a 1\$ just saying making you'll need more 🤔

**Azboygordo1:** "Yo. I'm good with all that. Just ah...let me know what you need me to do. Fucking...the quicker we get rid of these mother fuckers the quicker we can flip it. You know what I mean. But ah...."  
(Audio Message)

...

**TA#01:** Fam, I have a 50 pack on the way. And fucking where do I have them park fam? Is there a specific spot where you want to tell them park at the addy? (Audio Message)

**Azboygordo1:** Ah...shit just have um come in. It's a big ass fucking lot. So just have um park in the lot. You know what I mean? When they come in they'll see my...they'll see a black Durango right there. Fucking um...just have um come in and shit. I'll get them right at the gate. Just have them come in this dirt lot. (Audio Message)

22. Based on your agents training, experience, and knowledge of this investigation, in the above conversation when GLEN says “30w 25th st”, agents believe that GLEN is telling MORENO-AGUILAR that he is going to be distributing the counterfeit M30 pills out of 30 West 25<sup>th</sup> Street on behalf of MORENO-AGUILAR. When MORENO-AGUILAR says “...I have a 50 pack on the way...” and “...where do I have them park...”, agents believe MORENO-AGUILAR is telling GLEN that someone is on their way to purchase 50 counterfeit M30 pills, and MORENO-AGUILAR is asking where he should have them park. GLEN responds with “...have um park in the lot...”, and “... they’ll see a black Durango...” , agents believe that GLEN is telling MORENO-AGUILAR to have the customers park in the lot where GLEN’s Dodge Durango is parked. Agents know GLEN to drive a black colored Dodge Durango with Arizona Registration V9A24E. When GLEN says “... I’ll get them right at the gate...”, agents believe GLEN is telling MORENO-AGUILAR that he will meet at the “gate” to conduct

the sale of counterfeit M30 pills. Agents conducted physical surveillance at 30 West 25<sup>th</sup> Street and observed that there is a large dirt lot located on the west side of the property which has a chain link fence that has several gates on it.

23. Agents continued to intercept messages between GLEN, using “azboygordo1”, and MORENO-AGUILAR, using **TA#01**, in which MORENO-AGUILAR is telling GLEN about various different customers who are on their way to purchase counterfeit M30 pills from GLEN at 30 West 25<sup>th</sup> Street. For example, agents intercepted the following messages on December 30, 2021:

**TA#01:** Famo, that 200 pack is pulling up. (*Audio Message*)

...

**TA#01:** 100 pack pulling up

...

**TA#01:** Famo. Famo. I got a 100 pack and a 50 pack. Are you still active? (*Audio Message*)

...

**TA#01:** I'm gonna have a 50 pack outside right there right behind your car. 50 pack. Same little homie. (*Audio Message*)

24. In the above referenced conversations agents believe that MORENO-AGUILAR is telling GLEN that customers are on their way to purchase counterfeit M30 pills, and MORENO-AGUILAR is telling GLEN the quantities of counterfeit M30 pills that the customers are purchasing.

25. On January 3, 2022, agents intercepted conversations between GLEN, using “azboygordo1”, and MORENO-AGUILAR, using **TA#01**, during which agents identified that GLEN picked up approximately 10,000 counterfeit M30 pills while driving his Dodge Durango. Shortly after intercepting the communications, at approximately 6:46 PM, agents observed GLEN return to his residence at 871 West Acadia Drive, in the Dodge Durango. Shortly thereafter, agents intercepted a video that was sent from GLEN, using “azboygordo1” to **TA#01**. In the video, agents observed a ANA’s left hand counting out nine Ziploc bags filled with approximately 1,000 counterfeit M30 pills on a table. During the video, a 10th Ziploc bag filled

with approximately 1000 counterfeit M30 pills is placed on the table by a GLEN's left hand. GLEN then pours the contents of bag number ten into a plastic Dutch Brothers cup which is placed on a scale and a female's voice states the weight which can also be seen on the scale as 111 grams. Agents confirmed that the hands in the video were those of GLEN and ANA by comparing visible tattoos from the video to known tattoos of GLEN and ANA.

26. At approximately 7:13 PM, shortly after the above referenced video was sent, agents observed the Dodge Durango depart the residence again, and travel to 30 West 25<sup>th</sup> Street. Agents made the following observations on surveillance (\*All times are approximate\*):

7:23 PM: *Durango arrives at 30 West 25<sup>th</sup> Street*

7:25 PM: *An unidentified individual approaches a Silver Toyota Camry that is parked next to the Durango.*

7:27 PM: *The Camry departs and stops briefly several blocks away*

7:55 PM: *Durango departs from 30 West 25<sup>th</sup> Street*

7:58 PM: *Durango stops near 2126 South 8<sup>th</sup> Avenue and an individual from the residence approaches the Durango and has a brief contact.*

7:59 PM: *Durango departs and travels to 132 South 34<sup>th</sup> Street, where an individual approaches the Durango and has a brief contact.*

8:04 PM: *Durango returns to 30 West 25<sup>th</sup> Street*

27. Based on your agents training, experience, and knowledge of this investigation, agents believe that GLEN transported counterfeit M30 pills from his address at 871 West Acadia Drive and took them to 30 West 25<sup>th</sup> Street, a location that was previously identified as a location that GLEN utilizes to distribute counterfeit M30 pills. Agents believe that GLEN delivered counterfeit M30 pills to

individuals who have not yet been identified at 2126 South 8<sup>th</sup> Avenue and 132 South 34<sup>th</sup> Street.

28. Agents continued to conduct surveillance at 30 West 25<sup>th</sup> Street, including on January 5, 2022, when agents observed a white colored Kia Rio, with Arizona Temporary Registration 628046B, which agents know to be associated with Vanessa MEZA, have a brief contact at the residence. Based on the interception of wire and electronic communications over **TA#01**, agents believe that MEZA is a purchaser of counterfeit M30 pills from MORENO-AGUILAR.

29. Furthermore, agents have observed numerous vehicles associated with GLEN and ANA, to include the Dodge Durango, and a Recreational Vehicle with Arizona Registration 8XA4GD, registered to GLEN, parked at the property.

#### **2510 NORTH WINSTEL BLVD. #102**

30. Agents spoke with the Tucson Electric Power Company and identified that GLEN has had active utility service at 2510 North Winstel Boulevard, Unit #102, since November 10, 2021. Furthermore, agents confirmed via surveillance that GLEN is observed on numerous occasions, including on January 7, 2022, to enter and exit from Unit #102 at 2510 North Winstel Boulevard. Agents also observed that when GLEN parks his known vehicles, including the Dodge Durango and the Chevrolet Equinox, he parks in the parking lot adjacent to and closest to Unit #102.

31. In the December 29, 2021, conversations referenced above, when GLEN, using “luckyana520”, tells MORENO-AGUILAR “... I got a spot on the North side...”, agents believe GLEN is telling MORENO-AGUILAR that he will use 2510 North Winstel Boulevard, which is geographically located on the north side of Tucson, to store and distribute controlled substances.

32. On January 1, 2022, agents intercepted a conversation between GLEN, using “azboygordo1” and MORENO-AGUILAR, using **TA#01**. A portion of the conversation is below:



**TA#01:** Goodmoring Famo 🍷  
**Azboygordo1:** Yo morning we ready???...  
**TA#01:** Gang whenever your ready Famo 🍷🍷  
**Azboygordo1:** Let's get that money yo...  
**TA#01:** 300 for 500\$ where the spot at  
**Azboygordo1:** 2510 W. Winstel Boulevard  
**TA#01:** Is there a specific spot where you want me to have him park at. (*Audio Message*)  
**Azboygordo1:** It is in an apartment so just have them park by the trashcan...  
**TA#01:** Bet  
**TA#01:** Famo so there a 300 play a 50 pack and a 100 pack on the way (*Audio Message*)

33. Based on your agent's training, experience, and knowledge of this investigation, agents believe that when GLEN says "Yo morning we ready???...", GLEN is asking MORENO-AGUILAR if they are ready to begin distributing counterfeit M30 pills. When MORENO-AGUILAR says "300 for 500\$ where the spot at", agents believe that MORENO-AGUILAR is saying that he has a customer ready to purchase 300 counterfeit M30 pills for \$500 and is asking GLEN where MORENO-AGUILAR should send the customer. GLEN responds with "2510 W. Winstel Boulevard", which agents believe GLEN is referring to 2510 North Winstel Boulevard, #102. Agents conducted an online search and identified that a "West Winstel Boulevard" does not exist in Tucson, and furthermore noted that Winstel Boulevard in Tucson, travels North and South.

34. On January 1, 2022, agents intercepted communications between telephone number (520) 274-6234, known to be utilized by John ELLIOTT, and MORENO-AGUILAR, using **TD#1**. At approximately 2:10 PM, ELLIOTT tells MORENO-AGUILAR that he will be driving a black Jeep, and MORENO-AGUILAR tells him to go by the mailboxes, which agents know to be referring to the mailboxes at 2510 North Winstel Boulevard. Agents observed a black colored Jeep with Arizona Registration CVJ0784 depart from 2510 North Winstel Boulevard a short time later. At approximately 2:24 PM, the TPD conducted a traffic stop on the Jeep, and



confirmed that ELLIOTT was a passenger in the vehicle. The vehicle was not searched by the TPD, and was subsequently released.

35. Agents continued to intercept communications from January 3, 2022 through January 7, 2022, between GLEN, using “azboygordo1”, and MORENO-AGUILAR, using **TA#01**, in which GLEN provided 2510 North Winstel Boulevard as the location for which he would be distributing counterfeit M30 pills from. Agents also observed that MORENO-AGUILAR, using **TA#01**, provided the 2510 North Winstel Boulevard address, along with instructions to park near the trash cans, to numerous different customers, who were coordinating to purchase counterfeit M30 pills.

36. On January 7, 2022, agents conducted surveillance at 2510 North Winstel Boulevard, after intercepting communications over **TA#01**, that this location was being utilized to distribute counterfeit M30 pills. Agents observed that the Dodge Durango belonging to GLEN was parked at the complex. At approximately 2:43 PM, agents observed a white Volkswagen Jetta, with Arizona Registration CGR6511, driven by a female arrive at 2510 North Winstel Boulevard and park on the street near the trash cans. Agents had previously identified this vehicle to belong to Libby DENMAN, who was identified through intercepted communications as being a purchaser of counterfeit M30 pills from MORENO-AGUILAR. Agents then observed GLEN walk up to the vehicle and have a brief contact with the vehicle. The vehicle then departed at approximately 2:50 PM., and agents observe GLEN walk back to the general area of Unit #102. Agents recognized this brief interaction to be consistent with the modus operandi of controlled substance traffickers. Agents continued to observe GLEN have brief contacts with several other vehicles that would arrive to the complex and park near the trash bins. Agents identified that GLEN would come from apartment #102, and would return to the same apartment after completing the brief contacts.

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**PROBABLE CAUSE AS TO FIREARMS OFFENSES**

37. On January 21, 2022, United States District Court Magistrate Judge Bruce G. Macdonald issued Federal Search Warrant 22-01425MB, authorizing the search of 2510 North Winstel Boulevard, Unit #102, in Tucson, Arizona.

38. On February 3, 2022, Federal Search Warrant 22-01425MB was executed at 2510 North Winstel Boulevard, Unit #102, in Tucson, Arizona. While searching the apartment, agents entered a bedroom wherein indicia of occupancy for GLEN was located. Another individual located in the residence additionally identified that bedroom to be GLEN's. Also in the bedroom closet was a bag containing 5,000 pills of what appears to be, based on the agents training and experience, counterfeit M30 pills, suspected to contain fentanyl. Federal Search Warrant 22-01425MB authorizes the seizure of said controlled substances, however, also in the closet was a small pistol. Due to the warrant not covering firearms, the firearm was not inspected. Further, rifle magazines were also observed in the residence.

39. Agents know that GLEN has felony convictions, punishable for more than one year, and is therefore prohibited from possessing firearms and/or ammunition.

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**CONCLUSION**

Based on the aforementioned factual information, I respectfully submit that there is probable cause to believe that evidence described in Attachment B, of the offenses listed herein, will be found at the locations described in Attachment A, and request the issuance of the attached search warrant.

Respectfully Submitted,

*Brad Kiernan*

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Special Agent Brad Kiernan  
Federal Bureau of Investigation

Subscribed and sworn to me telephonically  
this 3rd day of February, 2022

*Jacqueline M. Rateau*  
Honorable Jacqueline M. Rateau  
United States Magistrate Judge